

**UNITED STATES COURT OF APPEALS
FOR THE NINTH CIRCUIT**

NATIONAL LABOR RELATIONS BOARD)	
)	No. 18-72038
Petitioner)	
v.)	RESPONDENT'S
)	ANSWER TO
KALTHIA GROUP HOTELS, INC. and MANAS)	APPLICATION FOR
HOSPITALITY LLC d/b/a HOLIDAY INN)	ENFORCEMENT OF AN
EXPRESS SACRAMENTO, a Single and/or)	ORDER OF THE
Joint Employer)	NATIONAL LABOR
)	RELATIONS BOARD
Respondent)	

Kalthia Group Hotels, Inc. and Manas Hospitality LLC d/b/a Holiday Inn Express Sacramento (“Manas”) hereby answers the Application for Enforcement of an Order of the National Labor Relations Board (“NLRB”) in this case. There has been no failure or refusal by Manas to comply with the NLRB’s June 25, 2018 Order in Board Case Nos. 20-CA-176428, 20-CA-178861, and 20-CA-182449, and Manas is prepared to comply with that Order on a voluntary basis. Manas has informed the NLRB of its willingness to comply with the June 25, 2018 Order. Therefore, the Application for Enforcement should be denied inasmuch as an enforcement order is not necessary in order to obtain compliance with the NLRB’s June 25 Order.

DATED this 8th day of August, 2018.

/s/ Nathan R. Niemuth
Nathan R. Niemuth

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